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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
CHESTER CARY, JR	§	CASE NO. 22-31546-SGJ-13
	§	
Debtor	§	CHAPTER 13

OFFICE OF THE STANDING CHAPTER 13 TRUSTEE	§	
	§	
Movant	§	HEARING DATE: 07/13/2023
	§	HEARING TIME: 8:30 AM
vs.	§	
	§	
CHESTER CARY, JR	§	
	§	
Debtor	§	

**DEBTOR'S OBJECTION TO TRUSTEE'S RECOMMENDATION
CONCERNING CLAIMS, OBJECTION TO CLAIMS AND PLAN MODIFICATION**

COMES NOW, the Debtor with this Objection to the Trustee's Recommendation
Concerning Claims, Objection to Claims, and Plan Modification and in support of the Objection
would show the Court the following:

1. The Debtor objects to Paragraph IV: Plan Modification, Subject to Feasibility, for the following reasons:
 - (a) Trustee requests the following Modification of the Debtor's Confirmed Plan:
No modification needed
Debtor requests that plan payment arrears be cured in TRCC order and that changes to the monthly Plan payments (if needed) be determined by the Chapter 13 Trustee.
2. Debtor's attorney fees for this Objection:
Total amount of \$650.00, of which \$650.00 will be paid through the plan by the Trustee pro-rata, after payment of specified monthly payments and before any other pro-rata payments.

WHEREFORE, PREMISES CONSIDERED, Respondent prays Movant's Objection to Claims, Recommendation Concerning Allowed Claims and Plan Modification be denied and for any such other and further relief in law and equity as the Court deems just.

DATED: July 10, 2023

Respectfully Submitted,

Leinart Law Firm
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By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2023, I did serve a true and correct copy of the foregoing to the following interested parties, and to those listed on the matrix as filed with the Court, by United States Mail, First Class:

Chester Cary, Jr
5706 Trailwood Drive
Dallas, TX 75241

Tom Powers, Dallas Ch 13 Trustee
105 Decker Crt, Ste 1150
Irving, TX 75062

United States Trustee
1100 Commerce St, Rm 976
Dallas, TX 75242

By: /s/ Marcus Leinart
Marcus Leinart
ATTORNEY FOR DEBTOR